



# Aquaculture Stewardship Council

## Chain of Custody (CoC) Module

Version 1.0

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## Responsibility for these Requirements

The Aquaculture Stewardship Council (ASC) holds responsibility for this document.

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## About the ASC

ASC is the acronym for Aquaculture Stewardship Council, an independent not for profit organisation. The ASC was founded in 2010 by the WWF (World Wildlife Fund) and IDH (The Sustainable Trade Initiative) to manage the global standards for responsible aquaculture. The ASC standards were first developed by the Aquaculture Dialogues, a series of roundtables initiated and coordinated by the WWF.

### What the ASC is

The ASC's certification programme and logo recognise and reward responsible aquaculture.

The ASC is a global organisation working internationally with aquaculture producers, seafood processors, feed producers, retail and foodservice companies, scientists, conservation groups, social NGO's and the public to promote the best environmental and social choice practices in aquaculture.

### What the ASC does

Working with partners, the ASC runs a programme to transform the world's aquaculture markets by promoting the best environmental and social aquaculture performance. The ASC seeks to increase the availability of aquaculture products certified as sustainably and responsibly produced. The ASC's consumer logo provides third party assurance of conformity with production and chain of custody standards and makes it easy for everyone to choose ASC certified products.

### What the ASC will achieve

The ASC is transforming aquaculture practices globally through:

- Credibility:** Standards developed according to [ISEAL](#) and the Food and Agriculture Organisation of the United Nations (FAO) guidelines, multi-stakeholder, open and transparent, science-based performance metrics.
- Effectiveness:** Minimising the environmental and social footprint of commercial aquaculture by addressing key impacts while increasing farm efficiency.
- Added value:** Connecting the farm to the marketplace by promoting responsible practices through a consumer logo.

## Overview of the ASC System

The ASC system is made up of 3 components:

### 1. ASC Standards

The ASC works with independent third-party certification organisations that provide certification services for operations that grow one or more of the species or produce products for which the standards have been approved by ASC.

The species groups were chosen because of their potential impact on the environment and society, their market value and the extent to which they are traded internationally or their potential for such trade. The species covered at this time include: abalone; bivalves (clams, oysters, mussels and scallops); flatfish; freshwater trout; pangasius; salmon; seabass, seabream and meagre; seriola and cobia; shrimp; tilapia and tropical marine finfish. There is also a joint ASC-MSC Seaweed Standard. ASC continuously develops criteria and indicators applicable for other aquaculture species of commercial interest.

Through the Aquaculture Dialogues more than 2,000 people have participated in the development of the ASC Standards including fish farmers, seafood processors, retailers, foodservice operators, NGOs, government agencies and research institutes. Universal, open and transparent, the Aquaculture Dialogues focused on minimising the key environmental and social impacts of aquaculture. Each Dialogue produced requirements for one or a range of major aquaculture species groups. The standard creation process followed guidelines of the *ISEAL Code of Good Practices for Setting Social and Environmental Standard* and *FAO Technical Guidelines on Aquaculture Certification*. The standards are science-based, performance-based and metrics-based and will apply globally to various production systems, covering many types, locations and scales of operations.

The standards are owned and managed by the ASC as an independent standard setting organisation. Review and revision of existing standards as well as development of new standards follow strict guidelines, as set out above.

The ASC released the ASC Feed Standard in June 2021, which complements the species standards and supports the recognition of responsible aquaculture.

### **2. Independent 3<sup>rd</sup> Party Audits Conducted by accredited Conformity Assessment Bodies (CABs)**

Applicants that seek ASC certification hire a CAB (Conformity Assessment Body). Only clients that are certified by a CAB accredited by the ASC appointed accreditation body are eligible to sell certified product into a recognized chain of custody and have that product eligible to carry the ASC logo, claims and other trademarks.

Accreditation is the process by which CABs are evaluated to determine their competency to provide certification to the ASC standards. The accreditation process includes annual evaluations of each accredited CAB and the ASC audits they perform. The ASC works with an exclusively appointed accreditation body (AAB) to provide accreditation services for the ASC.

The ASC's AAB is responsible for evaluations of CABs against the requirements in this document. All accreditation decisions are taken independently by the AAB in accordance with ISO 17011. The independence of the ASC, AAB and the CABs ensures that high quality, objective audits and certification decisions are performed without bias for all clients around the world.

### **3. MSC Chain of Custody (CoC) Certification and the ASC trademarks**

The ASC logo and claims have been developed for use by certified and licenced farms, processors and distributors so that all parts of the value chain and especially consumers can easily identify ASC certified product(s). The use of the ASC logo, claims and trademarks can be applied only to products that are sold through a consecutive, certified chain of custody (CoC) that ensures traceability of certified products from production to final point of sale. For the ASC, CoC is certified through application of the MSC chain of custody system. Only products that originate in ASC certified operations and are sold through the MSC (ASC) certified CoC, are eligible to carry the ASC logo, claims or trademarks.

Companies that are already certified to the MSC Chain of Custody Standard and wish to also handle ASC certified products, may request a scope extension from their CAB in order to add ASC products onto the scope of their existing CoC certificate. Further specific requirements may need to be complied with depending on the ASC/MSC CoC standard. Further information can be found on the ASC website.

Just as with the ASC standards, the ASC logo, claims and trademarks are owned by the ASC which regulates all aspects of their use.

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## Introduction to this Document

These ASC Chain of Custody Module requirements are normative for all conformity assessment bodies (CABs) carrying out chain of custody audits with ASC products in scope.

This document provides supplementary requirements to the MSC scheme documents:

- [Chain of Custody Standard: Default Version v5.0](#)
- [Chain of Custody Standard: Group Version v2.0](#)
- [Chain of Custody Standard: Consumer Facing Organisation Version v2.0](#)
- [Chain of Custody Certification Requirements v3.1](#)
- [General Certification Requirements v2.4.1](#) and
- [MSC-MSCI Vocabulary v1.3](#).

**NB:** Text from these MSC scheme documents is “*quoted in italics*.” Original clause number references have been retained.

### Normative References

The documents listed below are part of the ASC Certification Requirements.

The following apply directly to Chain of Custody applicants and certificate holders:

- a) This ASC CoC Module
- b) The MSC (ASC) CoC Standard
- c) The ASC data retention and data ownership policies; See [www.asc-aqua.org](http://www.asc-aqua.org)
- d) Applicable laws and regulations of governmental or other competent authorities.



# PART A – Additions to MSC CoC Standard Default Version v5.0, MSC CoC Standard Group Version v2.0 and MSC CoC Standard Consumer-Facing Organisation (CFO) Version v2.0 (Requirements for organisations)

## Eligibility for ASC CoC Certification

For ASC CoC certification, organisations whose activities include processing, contract processing, packing or repacking shall be certified by a [Global Food Safety Initiative \(GFSI\) recognized scheme](#) or [ISO 22000](#) covering the scope of their supply chain activities throughout the entire time period of their ASC CoC certification.

Organisations with less than EUR 2 million annual turnover **or** less than 200 MT annual volume of seafood traded **or** less than 50 seafood-business staff (including at peak times) are exempt from this requirement, however they shall still comply with food safety regulations and inspections.

**Guidance.** Activities are defined in the [MSC CoC Certification Requirements v3.1](#), “Table 4. Activity scope definitions.” Only sites that perform the specified activities must be covered by GFSI-recognised scheme or ISO 22000 certification. Organisations exempt due to size are strongly encouraged to demonstrate production of safe and legal seafood through independent endorsement appropriate to the scale and location of their business, for example [BRCGS START](#), [GFSI Global Markets Programme](#), [Safe and Local Supplier Approval \(SALSA\)](#) in the UK or other similar programmes for small businesses.

## Principle 1. Certified products are purchased from certified suppliers

1.1. *“The organisation shall have a process in place to ensure that all certified products are purchased from certified suppliers, fisheries, or farms.”*

**1.1.1.** Organisations that buy directly from ASC farms, including when a new farm supplier is added, shall check the starting point of CoC and confirm there is no gap in CoC certification coverage between the point where the farm certification ends and their point of purchase as first buyer in the supply chain.

**1.1.1(a).** If such a gap is identified and left unaddressed, the certified chain of custody is broken and the organisation shall not sell affected products as certified.

**Guidance to 1.1.1 and 1.1.1(a).** Refer also to MSC CoC Standard Guidance 1.1. The starting point of CoC is defined in the farm audit report and is stated on the farm certificate. For example, if the farm (or farm CoC) certificate ends at offloading at the dock, the first buyer’s CoC certificate must cover from the dock onwards. Similarly, if the farm (or farm CoC) certificate ends at the farm

gate, the first buyer's CoC certificate must begin at the farm gate. The gap can be addressed by ensuring it is covered by CoC certification. It can be included in the scope of the organisation's CoC certificate or within the scope of another certificate holder (CoC or farm if appropriate).

**1.1.2.** Organisations that buy directly from ASC farms, including when a new farm supplier is added, shall check factors that may affect eligibility of product to be sold as certified.

**Guidance to 1.1.2:** Refer to the ASC website for a [list of factors that may affect eligibility of product](#) to be sold as certified. Organisations should refer to this list to determine if any factors affect product they handle.

#### Principle 4. Certified products are traceable and volumes are recorded

*4.4 "The organisation shall maintain records that allow volume calculation of certified product."*

**4.4.2. (4.2.2 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** The organisation shall submit to ASC the data requested at the frequency and in the format specified by ASC.

**Guidance to 4.4.2. (4.2.2 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** Data required to be submitted includes purchase and sales volumes, species, buyers and suppliers, and may cover consumer-facing and non-consumer facing products. Data on products from certified origins but not sold as certified may be requested when necessary to verify conformance with ASC requirements, for example in an investigation. More information is available on the [ASC website](#).

**4.4.3. (Not applicable to MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** If seafood is purchased as ASC certified but then converted to a non-certified status (and will never be sold as certified), the organisation shall provide access to records of such converted products as needed for investigations.

**Guidance to 4.4.3. (Not applicable to MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** Access to such records may need to be provided to ASC, the CAB or the accreditation body.

#### Principle 5. The organisation's management system addresses the requirements of this Standard

*5.2 "Reporting changes"*

**5.2.1.1. (5.3.1.1 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** For ASC CoC, the organisation shall have an effective process to inform their CAB within two (2) days when any of the following apply:

- (a) if their GFSI-recognised or ISO 22000 certification becomes invalid (if the organisation is a processor or packer and they are not exempt based on size).

- (b) if a court case or other legal action related to the scope of the CoC Standard arises.
- (c) of becoming aware that they, or their products, are not in conformance with any relevant applicable laws, regulations, ASC standards and/ or requirements.

*“5.4 Non-conforming product”*

**5.4.2. (5.5.2 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** If products are non-conforming, the non-conforming product process shall be followed.

*“5.5 Requests for traceability and supply chain assurance”*

**5.5.2.1. (5.6.2.1 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** For ASC CoC, the organisation shall allow MSC or its designated agents, ASC or its designated agents, the CAB and/ or the accreditation body to collect samples of seafood from certified sources or other substances for the purposes of product authentication testing or verification of conformity.

**Guidance to 5.5.2.1. (5.6.2.1 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** Samples from certified sources include seafood that is not sold or dispatched as certified. Collection of samples not sold or dispatched as certified will be conducted only as needed for investigations and for ASC development of new product authentication tools, and not on a regular basis. If samples for testing are required by ASC, and the results show conformance, the cost is charged to ASC. CABs may also decide to collect samples for testing, in which case the cost is charged to the client. Sampling agents should refer to the ASC sampling procedure.

**5.8 (5.9 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0) Specific requirements for ASC CoC**

**5.8.1. (5.9.1 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** The organisation shall maintain a food fraud vulnerability assessment (FVA) procedure that covers farmed seafood products including an up-to-date intervention plan.

**Guidance to 5.8.1. (5.9.1 in MSC CoC Standard: Consumer-Facing Organisation Version v2.0).** The objective of this requirement is to encourage organisations to increase awareness and attention to areas of potential risk for seafood fraud, and to continually improve the process over time. The aim of the FVA is to understand potential vulnerabilities affecting a food product or ingredient and provide a framework to prioritise strategies for prevention and mitigation of food fraud. The intervention plan should identify controls and/or interventions needed to reduce vulnerabilities identified, and how these measures will be implemented.

The FVA procedure and intervention plan may be the same as required by the GFSI-recognised food safety scheme that the organisation is certified with, provided it covers farmed seafood products. FVAs are required for all ASC CoC certificate holders, even if the GFSI-recognised scheme certification requirement in this ASC CoC Module does not apply to them. The FVA may encompass existing elements of an organisation’s Vulnerability Assessment Critical Control Points (VACCP) or Threat Assessment Critical Control Points (TACCP) plans.

The assessment procedure can be done at the appropriate timing for the organisation as part of the normal internal management cycle, provided it is completed at least once per year. The intervention plan can follow the same cycle, provided it is up to date in reflecting the latest risks and actual cases the organisation faces and is able to effectively address relevant risks of food fraud.

Examples of resources and tools that can be used for FVA:

- [GFSI Food Fraud Technical Document](#)
- [SSAFE Food Fraud Vulnerability Assessment](#)
- [USP Food Fraud Mitigation Guidance](#)
- [IFT Pre-screening Ingredients for a Food Fraud Vulnerability Assessment](#)
- [PAS 96: 2017 Protecting from Food Fraud](#)
- Food Fraud Initial Screening Model - [article](#), [one-pager](#), [primers](#) and [Excel guide](#)
  - Spink, J, DC Moyer and C Speier-Pero. 2016. “[Introducing the Food Fraud Initial Screening Model \(FFIS\)](#).” *Food Control* 69: 306–314.
- [Campden BRI Guideline 72: TACCP/ VACCP Practical Guide, Second Edition](#)
- [Food Fraud Advisors Vulnerability Assessment Tools](#)
- [Michigan State University and DNV Food Fraud webinar series](#)
- [BRC Understanding Vulnerability Assessment & BRC Food Interpretation Guidance](#)
- [FSSC 22000 Guidance Document: Food Fraud Mitigation](#)
- [SQF Food Fraud Implementation & Audit Guidance & Guidance for Sites and Auditors](#)
- [IFS Guideline for Product Fraud Mitigation](#)
- [Fighting Food Fraud with Vulnerability Assessment](#)

Small or less developed businesses can refer to [BRCGS START](#), [GFSI Global Markets Programme](#), [Safe and Local Supplier Approval \(SALSA\)](#) in the UK or other similar programmes. Other tools or guides may be used, provided they address similar objectives.

## PART B - Additions to CoC Certification Requirements v3.1 (Requirements for CABs)

### Ineligibility for certification

**6.2.8.1:** The CAB shall not certify (nor continue to certify) organisations which meet any of the ineligibility criteria defined by ASC.

The following ineligibility criteria relate to activities involving an organisation's beneficial owners, leadership, staff or other connected persons or other entities under the organisation's control.

- Illegal activities or products that are not consistent with applicable laws and regulations relevant to the 'scope of the CoC Standard'<sup>1</sup>
- Fraudulent activities, such as forged documents or 'seafood fraud'<sup>2</sup>
- Corruption or otherwise unethical behaviour
- History of repeated, persistent or systematic non-conformities
- Successful prosecution for forced labour, child labour, slavery or human trafficking
- The organisation presents a reputational risk to ASC via association due to doubt about its transparency, impartiality or overall credibility

**Guidance to 6.2.8.1:** There must be objective evidence that a criterion applies. Relevant information and evidence may come from ASC, the CAB or other parties. If a CAB is in doubt of whether an organisation should be certified, they should exercise caution and deny certification until evidence demonstrates the organisation's conformance with ASC requirements. ASC anticipates use of the ineligibility criteria would occur infrequently and in relatively rare serious cases.

Companies may become eligible for certification after 24 months provided there is sufficient evidence of an adequate root cause analysis and proven effective implementation of corrective actions.

Regarding the criterion on illegal activities or products, the below table offers examples of applicable types of laws considered in scope and not applicable laws considered out of scope.

Applicable/ in scope	Not applicable/ not in scope
Permits and licenses to operate, including for site and equipment	Environmental laws (unless part of permits and licenses)
Record-keeping and reporting laws, and others affecting traceability	Tax and bankruptcy laws
Labelling, packaging and product-related laws	Criminal laws (violent crime, drugs and alcohol, white collar crime)

<sup>1</sup> See Definition: Scope of the CoC Standard.

<sup>2</sup> See Definition: Seafood Fraud

Food safety and public health laws	Maritime laws
Business and corporate laws (related to management system)	Military laws
Social and labour laws (child labour, forced labour, slavery, human trafficking, civil rights, immigration law)	Family and personal injury laws

### 6.3 Application and scope extension

6.3.1. *“Having established the recommended option for CoC certification and confirmed the applicant’s eligibility to proceed with certification, the CAB shall request information from the applicant to determine: ... ”*

**6.3.1(e)** ... any ongoing or concluded court cases or other legal action related to the scope of the CoC Standard that have occurred in the previous 24 months.

## 7 Audit planning

### 7.3. Additional audit planning for ASC CoC

**7.3.1.** For ASC CoC, prior to each audit, the auditor shall confirm that organisations whose activities include processing, contract processing, packing or repacking are certified by a [Global Food Safety Initiative \(GFSI\) recognised scheme](#) or [ISO 22000](#) covering the scope of their supply chain activities throughout the entire time period of their ASC CoC certification (unless the organisation is exempt based on size; refer to Eligibility criterion).

### 11.3 Surveillance frequency, additional audits and non-conformities

**11.3.2.5.** In addition to 11.3.2, ASC CoC certificate holders shall be selected for unannounced audits on a risk basis as determined by the ASC unannounced audit risk calculator.

(a) For CABs with less than 100 ASC CoC clients, one (1) additional high-risk ASC CoC client shall be selected for an unannounced audit.

(b) For CABs with 100 or more ASC CoC clients, two (2) additional high-risk ASC CoC clients shall be selected for an unannounced audit.

(c) For this requirement, it is not necessary for the audit to occur on-site.

(d) For this requirement, unannounced audits are not additional to regular annual audits.

(e) Product sampling for testing shall take place during unannounced audits if determined necessary by the CAB or ASC.

**11.3.9.1.** For ASC CoC, where the CAB becomes aware of objective evidence of a client’s non-conformity at any point during the certificate cycle, in a timely manner the CAB shall raise a non-conformity and classify it as per 9.2-4, or take a certification decision relative to the nature of the non-conformity.

**Guidance to 11.3.9.1.** The CAB must act on objective evidence regardless of action or inaction of other parties. “Timely manner” means without delay. Response action may include refusal of certification, issuing non-conformities or suspension or withdrawal of the certificate, per existing requirements depending on the severity of the issue and the evidence available.

**11.3.9.2.** For ASC CoC, if the CAB becomes aware of a), b) or c) below, within seven (7) days the CAB shall determine timelines and actions to be taken to verify conformance with relevant items in the CoC Standard:

- a) the ASC Logo License Agreement has been suspended or terminated due to conformance issues as notified by ASC,
- b) a court case or other legal action related to the scope of the CoC Standard,
- c) information from the organisation that it or its products are not in compliance/ conformance with relevant applicable laws, regulations, ASC standards and/ or requirements.

**11.3.9.3.** If the CAB becomes aware that requirements of the ASC Logo License Agreement are not met, they shall notify ASC within five (5) days.

**11.3.10.** The CAB shall comply with any request from ASC to collect samples of seafood from certified sources or other substances for the purposes of product authentication testing or verification of conformity.

**Guidance to 11.3.10.** Refer to Guidance to clause 5.5.2.1 in this CoC Module. Sampling agents should refer to the ASC sampling procedure. Requests for samples are based on an ASC risk assessment. Sample requests to CABs will primarily take place when ASC staff or their agents are not available to collect the samples.

## PART C - Additions to MSC General Certification Requirements

### v2.4.1 (Requirements for CABs)

#### 4.8.6 Contract with CoC clients

4.8.6 *“The CAB’s contract with CoC clients shall specify the following:*

*a. The client is required to conform to the relevant MSC CoC Standard.”*

- i. For clients with ASC in scope, the client is required to conform to the ASC CoC Module.

#### 7.4.9 Reasons for CoC certificate suspension

7.4.9 *“The CAB shall suspend a CoC certificate if any of the following occur:”*

**7.4.9(k).** The CAB or ASC determines the organisation meets any of the ineligibility criteria defined by ASC.

**7.4.9(l).** If the organisation is required to have a GFSI-recognised scheme or ISO 22000 certification, and the certification becomes invalid at any time during the period of CoC certification.



## PART D – Additions to MSC-MSCI Vocabulary v1.3

### ASC non-conforming product

A product that is identified, sold or dispatched as certified but is not traceable to an ASC certified farm or farms, or does not conform with ASC requirements. ASC non-conforming product is not allowed to be sold as certified.

### Scope of the CoC Standard

Refers to the boundaries of the topics addressed by the CoC Standard. For a topic to be considered in scope, there must be at least one clause in the CoC Standard related to the topic. For example, topics within scope are product labelling (2.3, 2.4), seafood fraud (3.1, 5.8), traceability (Principle 4), forced and child labour (5.7), and food safety (eligibility), while environmental topics are out of scope.

### Seafood fraud

Seafood fraud is the deliberate misrepresentation of seafood products (or ingredients), for financial or economic gain, with the intention of deceiving the customer. There are many different types of seafood fraud that can take place at multiple points along the supply chain, both domestically and internationally.

Examples include - substitution (of species, of non-certified for certified, etc), volume inflation, intentional mislabeling of products and/ or ingredients, provenance misrepresentation, misbranding, false marketing, counterfeiting, falsifying documents, unapproved enhancements, undeclared use of food additives such as water-binding agents to deceptively increase product weight, adding water or ice to deceptively increase weight, illegal use of food additives to enhance visual quality, inclusion of substances that are not consistent with claims (such as non-GMO, feed ingredients), or others.